

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION**

**WANDA COOPER**

**Plaintiff,**

**v.**

**TRAVIS McMICHAEL, ET AL.**

**Defendants.**

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**CIVIL ACTION NO.: 2:21-cv-20**

**RESPONSE TO COURT ORDER**

Come now Plaintiff Wanda Cooper and Defendants Robert Rash, Glynn County, Jackie Johnson and George Barnhill and file this response to the Court's Order (Doc. 201) and show the Court as follows:

1. As required by the Court's Order, counsel for these parties met and conferred on May 7, 2025. These parties agree that lifting the existing stay of discovery is not appropriate at this time.
2. Each of these Defendants presently has pending a Motion to Dismiss Plaintiff's First Amended Complaint. (Docs. 138, 140, 142 and 145).
3. Subsequent to the dismissal of the criminal proceedings against Jackie Johnson, these Defendants jointly filed a Renewed Motion to Stay Discovery (Doc. 194), and Plaintiff responded in opposition to that Motion (Doc. 195). Thereafter, Glynn County filed a reply brief. (Doc. 196).
4. On April 14, 2025, United States Magistrate Judge Cheesbro entered an Order (Doc. 197) granting Defendants' Renewed Motion to Stay Discovery concluding that "... a continued stay is appropriate as to all Defendants. The Court, therefore, **GRANTS** Defendants'

Renewed Motion to Stay and **STAYS** discovery and all other Rule 26 obligations until the resolution of Defendants' motions to dismiss." (Doc. 197, pp. 4-5).

5. These parties agree that the question whether it is appropriate to lift the stay of discovery has been resolved by Judge Cheesbro's Order (Doc. 197).
6. Plaintiff and these Defendants further agree that each of these Defendants has pending a motion to dismiss which is ripe for resolution by the Court. (Docs. 138, 140, 142 and 145).

This 12<sup>th</sup> day of May, 2025.

/s/ Mark V. Maguire

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**CERTIFICATE OF SERVICE**

This is to certify that I have this day served all parties in this case in accordance with the directives from the Court Notice of Electronic Filing (“NEF”), which was generated as a result of electronic filing.

Submitted this 12<sup>th</sup> day of May, 2025.

**/s/ James L. Elliott**

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